

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts Southern
District of Texas

FILED

December 7, 2021

Nathan Ochsner, Clerk of Court

United States of America)

v.)

Mario GUERRA Collazo)

COB: Mexican)

YOB: 1974)

Case No. 7:21-MJ-2551-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/07/2021 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC 841

*Offense Description*did knowingly and intentionally possess with the intent to distribute
approximately 2.08 kilograms of Cocaine, a Schedule II controlled substance.

21 USC 952

did knowingly and intentionally import with the intent to distribute
approximately 2.08 kilograms of Cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT A

☒ Continued on the attached sheet.


Approved for filing by AUSA Devin Walker

Sworn to and executed by reliable electronic means, sworn to
and attested telephonically per FED.R.CR.4.1, and probable
cause found on:Date: December 7, 2021 at 6:46 p.m.City and state: McAllen, TX/S/ Ana Aguilera

Complainant's signature

Ana Aguilera, Task Force Officer

Printed name and title


Judge's signature

U.S. Magistrate Judge Scott J. Hacker

Printed name and title

This affidavit is intended to establish sufficient probable cause and does not set forth all my knowledge about this matter.

On December 7, 2021, at approximately 09:00 a.m., Mario GUERRA Collazo, hereafter referred to as GUERRA, a citizen of Mexico, applied for admission into the United States at the Pharr Port of Entry (POE) in Pharr, Texas. GUERRA stated that he was traveling from Reynosa, Tamaulipas to Pharr, Texas and provided a negative oral declaration to primary CBPO for fruits, meats, plants, vegetables, firearms, drugs, and currency over \$10,000.00 US dollars. During primary inspection, primary CBPO noticed that GUERRA was sitting at an angle with the door open. GUERRA was asked to lean forward and an immediate pat down for weapons was conducted by the primary CBPO, resulting in the discovery of a large bulge on GUERRA's waistband. GUERRA was immediately secured and escorted to secondary.

The CBPO continued the immediate pat down for weapons in secondary which revealed the bulge to be a package of a white powdery substance that field tested positive for cocaine. A CBP Canine Enforcement Officer, along with his canine "Gandalf," conducted an inspection of GUERRA'S vehicle which yielded an alert to the center console area. A package was extracted from the vehicle and field tested positive for cocaine. The total weight for both packages was 2.08 kilograms.

On December 7, 2021, at approximately 11:37 a.m., Homeland Security Investigations (HSI) Task Force Officer (TFO) Ana Aguilera, along with HSI Special Agent (SA) Laron Smith interviewed GUERRA at the Hidalgo POE. GUERRA was read his Miranda Rights in the Spanish language. GUERRA waived his rights and agreed to provide a statement.

During his interview, GUERRA freely admitted that he conspired with known and unknown coconspirators to import narcotics into the United States. GUERRA stated that he was asked by a subject in Reynosa, Tamaulipas if he would be interested in a job. This unknown male explained that the job consisted of crossing narcotics into the United States in exchange for payment. GUERRA stated that he agreed and was told he would be earning \$300.00 US dollars per kilogram of cocaine.

GUERRA stated that on the night of December 6th, 2021, he met with an unknown male at a local supermarket in Reynosa who delivered two packages of cocaine. GUERRA stated that he took the narcotics home. This morning, December 7, 2021, GUERRA strapped one package of cocaine to his body and concealed a second package of cocaine underneath the center console area of the vehicle he was driving. GUERRA was to receive further instructions by phone once he successfully crossed the POE.